Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

COMMENT:

TTS requests modification of Section 74.1233(A)(1)(i)(A) to reflect that an FM translator can change channel to any other location on the band as a minor change. Currently FM translators must demonstrate interference to or from another broadcast station in order to move more than +/- 3 channels. This restriction is inconsistent with other services, including full power FM and all Television facilities. There is no logical reason to prevent FM translators from having access to the entire FM band for any minor change needed without any other demonstration of interference required.

Additionally, the "same-band" restriction should be eliminated in Section 74.1233(A)(1)(i)(B) to permit the use of the NCE "reserved" spectrum for FM translators which have previously operated in the Commercial Band. The FCC has not permitted any new NCE translator applications at any point this century, greatly restricting the use and expansion of the NCE translator service. This simple rule revision would solve this inequity.

A thorough review of this is hereby encouraged.

Respectfully Submitted

Jim Turvaville, Owner
Turbo Technical Services